

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,)	
)	
v.)	
)	
JOSHUA D. SPRINGER,)	Criminal No. 20-65
)	
Defendant.)	Electronically Filed

MOTION TO CONTINUE WAIVER OF INDICTMENT AND PLEA

AND NOW comes Defendant, Joshua D. Springer, by and through his attorney, Martin A. Dietz, Esquire, and respectfully requests that the Court continue the Waiver and Plea in the above matter on the following basis:

1. Defendant, Joshua D. Springer, has agreed to a plea agreement with the government in this case and the government has filed an Information to which Mr. Springer has agreed to plead guilty.
2. The Waiver of Indictment and Plea has been scheduled for April 1, 2020.
3. Due to the current coronavirus pandemic and the potential safety consequences thereof, undersigned counsel respectfully requests that the Waiver of Indictment and Plea be continued for a period of at least thirty (30) days.

4. To the extent relevant, Mr. Springer acknowledges that all time that elapses as a result of the filing of this motion is excludable pursuant to the Speedy Trial Act.

5. Assistant United States Attorney Lee Karl consents to the Court granting the within motion.

WHEREFORE, Defendant, Joshua D. Springer, respectfully requests that the Court continue the waiver of indictment and plea in this case.

Respectfully submitted,

s/ Martin A. Dietz.
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